

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

ALEXANDER VELAZQUEZ VELAZQUEZ
ELISA FRANCESCA MORALES MONTALVO

DEBTORS

CASE NO. 20-03820/EAG

CHAPTER 13

**DEBTORS' MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM 2020 TAX REFUND**

TO THE HONORABLE COURT:

NOW COME, ALEXANDER VELAZQUEZ VELAZQUEZ and ELISA FRANCESCA MORALES MONTALVO, the Debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Debtors' confirmed Plan dated September 28, 2020, provides that Debtors' tax refunds will be paid into the Plan.
2. The Debtor's 2020 tax return reflected that the Debtors were to receive a \$2,555.00 tax refund.
3. The Debtors have received the 2020 tax refund in the adjusted sum of \$1,619.00. Attached is copy of bank account statement, which reflects the direct deposit of the 2020 tax refund on April 8, 2021, issued by the Puerto Rico Treasury Department.
4. The Debtors respectfully submit to the Court that they need to use these funds to pay for: car repair and auto policy renewal. Attached is copy of car repair and auto policy renewal estimate/invoice.

Page - 2-
Debtor's Motion Requesting Order
Case no. 20-03820/EAG13

5. The Debtors need to use the funds from the 2020 "tax refund" to pay for these reasonable expenses. Furthermore, the Debtors are living within a very "tight" budget which barely covers their living expenses and a Plan payment of \$175.00.

6. Based on the above-stated, the Debtors respectfully request this Court to Order the authorization of the use of these funds to allow the Debtors to pay for this expense with the "tax refund".

WHEREFORE, the Debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2020 tax refund by the Debtors to pay for the above-stated expenses.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtors, Alexander Velazquez Velazquez and Elisa Franchesca Morales Montalvo, to the address of record: 370 Calle 10 Apt 88, Urb. Andrea's Court, Trujillo Alto PR 00976.

Page - 2-
Debtor's Motion Requesting Order
Case no. 20-03820/EAG13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 10th day of May,
2021.

/s/Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC 203614
ATTORNEY FOR PETITIONER
PO BOX 186
CAGUAS PR 00726-0186
TEL 787-744-7699/ 787-963-7699
EMAIL: rfc@rfigueroalaw.com

Advance Auto Parts FIPS 05093
RD 181 3.6KM/TR.AL. PLAZA
Trujillo Alto, PR 00976
(787)283-8100

WORKORDER 0020891
Page 1 of 6

Scan to RESUME transaction



R804550020891

Vehicle MINI COOPER 2013

Color _____

New Tire Location Tag # _____ VIN _____

PSI F _____ R _____

LF RF WW _____ BW _____

Torque F _____ R _____

LR RR Discard Tires _____

Present Mileage _____

Spare Save Tires _____

Tire Mileage Warranty _____

Old Tire Rotation _____

Previous Invoice No. _____

Tire Serial # _____

., Alexander
Trujillo Alto
Trujillo Alto PR 00976
(787)428-6965

Appointment Time: _____

Time Dropped Off: _____

Time Promised: _____

Cust#: 5093232947 Salesperson: 95433 PO#: _____ Date: 4/08/2021 Time: 3:03PM

QTY	SKU/CODE	TECH	DESCRIPTION	PART NO	VEHICLE	PRICE	EXTENDED T
4	10944047		FALKEN 225/45R18 1 E	TIRFAL2254518	MINI COOPER 2013	149.99	599.96 *
4	9801032		WHEEL BALANCE LIFETI	LABOR13	MINI COOPER 2013	14.99	59.96 *
1	82160019		SHOP/DISPOSAL HANDLN	SHOPDISPFEE	MINI COOPER 2013	4.00	4.00 *
4	2047397		1.25" CHROME VALVE S	T13WZS500G		2.98	11.92 *
4	9806023		ROAD HAZARD - AT SAL	HAZ2	MINI COOPER 2013	16.97	67.88
4	82160027		TIRE DISPOSAL FEE	TIREDISP	MINI COOPER 2013	1.70	6.80 *

Taxable Total: 682.64

Non Taxable Total: 67.88

State Tax: 71.68

Reduced State Tax: 0.00

Mun. Tax: 6.83

*** THIS IS NOT A RECEIPT ***

Page 1 of 1

*** CUSTOMER COPY ***



38 CALLE NEVAREZ
SAN JUAN PR 00927-4608
PO BOX 363846
SAN JUAN PR 00936-3846
Tel (787) 738-0101
Fax (787) 766-2786
www.segurosmultiples.com

10 de marzo de 2021

ALEXANDER VELAZQUEZ VELAZQUEZ
ANDREAS COURT
370 CALLE 10 APT 88
TRUJILLO ALTO PR 00976-7817

AVISO IMPORTANTE

Número de Póliza
01-4552652

Estimado señor VELAZQUEZ:

Agradecemos su patrocinio y lealtad al permitirnos asegurar sus propiedades. Le informamos que a la fecha de esta comunicación, aún no hemos recibido el pago de la renovación de su póliza 01-4552652 por \$1,049.00. Como es nuestro compromiso protegerle adecuadamente y que continúe con su cubierta, debemos recibir el mismo en o antes del 03/29/2021.

Aceptamos efectivo, tarjetas crédito, giro postal, y hacemos débito directo a su cuenta de cheques o ahorro. A su mejor conveniencia, puede realizar sus pagos a través de:

- www.segurosmultiples.com/pagos
- Sistema de pagos automatizados con acceso 24/7 al **787.771.5737**
- 10 oficinas de servicio en horario de lunes a viernes de 8:00 am a 5:00 pm.

Si desea financiar esta renovación, puede comunicarse con TeleSeguros Múltiples al 787.758.0101. Será un placer orientarle sobre las alternativas de financiamiento que tenemos disponible.

De usted haber emitido el pago correspondiente, favor hacer caso omiso a esta comunicación. Confiamos continuar protegiendo lo que más le ha costado y brindarle la tranquilidad de estar bien asegurado.

Cordialmente,

Jorge Mercado Alicea
Supervisor-Primas por Cobrar
Departamento de Finanzas

DEPT DE HACIENDA REINTEGROS	\$1,619.00
APRIL 8, 2021	

ATH MOVIL 9999	-\$42.00
APRIL 8, 2021	

ATH MOVIL 6706	-\$20.00
APRIL 7, 2021	